

## MetroWest Medical Center

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June 1, 2001

Kimberly Topper  
Center for Drug Evaluation and Research (HFD-21)  
Food and Drug Administration  
5600 Fishers Lane  
Rockville, MD 20857

Dear Ms. Topper,

As the Co-chairs of the Pain Initiative at MetroWest Medical Center, Framingham and Natick, Massachusetts, we are providing comment for the meeting June 14 and 15, 2001 regarding the medical use of opioid analgesics in various patient populations. We would like to express our opinion of the use of opioids in the non-malignant pain population.

We have worked very hard over the last five years, to meet the Joint Commission on Accreditation of Hospital Organizations (JCAHO) standards for pain management. It has been a long struggle to teach practitioners about the importance of pain management and to dispel years of myths and fears regarding the use of opioid analgesics. We are just beginning to touch the tip of the iceberg of successful pain management, hoping to increase the use of narcotics in the proper settings. We are still providing education and working to improve the management of pain, but placing restrictions on available options would be a serious mistake.

Enlightened practitioners realize that numerous medical conditions cause chronic pain, thus destroying quality of life in both the benign and malignant pain settings. As always, the key to proper usage of narcotics, in any formulation, long or short acting, continues to be proper practitioner education. To institute any restriction to access would propagate the myth that narcotics are a poor drug of choice and are to be feared.

We would recommend that your committee work to improve education efforts, rather than restrict access. We have come too far to step back in time now. Thank you.

Sincerely,

Hannah Lyons, RN, MSN, CNS  
Oncology Clinical Nurse Specialist  
Co-Chair, Pain Initiative

Carolyn Pratt, RN, BSN, OCN  
Co-Chair, Pain Initiative